

LDM:TRP
F.# 2012R000103

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

15 CR 381 (RJD)

VITALY KORCHEVSKY,
VLADISLAV KHALUPSKY,
LEONID MOMOTOK and
ALEXANDER GARKUSHA,

Defendants.

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The United States of America, by and through ROBERT L. CAPERS, United States Attorney for the Eastern District of New York, and Tanisha R. Payne, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1) and Title 28, United States Code, Section 2461(c). The United States hereby gives notice that, in addition to the specific property already listed in the forfeiture allegation of the Indictment, the United States seeks forfeiture of the following seized assets:

- (a) Four million six hundred fifty-one thousand one hundred sixty-six dollars and four cents, more or less, in U.S. currency, (\$4,651,166.04), seized on or about August 11, 2015, from Pershing, LLC account number XXXXXX191 held in the name of NTS Capital Fund, and all proceeds traceable thereto;
- (b) Seven hundred fifty-four thousand two hundred ninety-three dollars and no cents (\$754,293.00), more or less, seized on or about August 11, 2015, from E*trade account number XXXXX623 held in the names of Vitaly

Korchevsky and Svetlana Korchevsky, and all proceeds traceable thereto;
and

- (c) Thirty-four thousand three hundred twenty dollars and thirty-six cents (\$34,320.36), more or less, seized on or about August 11, 2015 from PNC bank account number XXXXXXXX988 held in the names of Vitaly Korchevsky and Svetlana Korchevsky, and all proceeds traceable thereto.

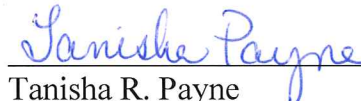
The United States reserves the right to supplement or amend this Bill of

Particulars.

Dated: Brooklyn, New York
December 30, 2015

ROBERT L. CAPERS
United States Attorney
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

By:



Tanisha R. Payne
Assistant United States Attorney
(718) 254-6538

To: All Defense Counsel of Record (via ECF)